

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

UNITED STATES OF AMERICA,
Plaintiff,

v.

43.412 ACRES OF LAND, MORE OR LESS,
SITUATE IN HIDALGO COUNTY, STATE
OF TEXAS, HIDALGO COUNTY
IRRIGATION DISTRICT NUMBER 2, *et al.*,
Defendants.

§
§
§
§
§
§
§
§
§

CIVIL ACTION NO. 7:20-cv-00239

**JOINT NOTICE OF SETTLEMENT IN PRINCIPLE BETWEEN
THE UNITED STATES OF AMERICA AND THE CITY OF PHARR**

1. Pursuant to Local Rule 16.3, Defendant, the City of Pharr, Texas (“the City”) and Plaintiff, the United States of America (collectively, “the Parties”), file this joint notice of the Parties’ forthcoming settlement agreement.

2. The United States and the City have reached a comprehensive settlement in principle that, once finalized, will resolve this matter entirely with respect to the City. The Parties are in the process of finalizing language that will require approval from Customs and Border Protection, the Department of Homeland Security, and the Department of Justice. Counsel are currently preparing settlement paperwork and drafting the easement that the Parties’ agreed to as part of this settlement to submit through this approval process.

3. Upon finalizing the Parties’ settlement agreement, the Parties will file a joint stipulation to settlement, detailing the terms of the Parties’ agreement and requesting that the Court enter an order of partial dismissal in accordance with those terms.

Respectfully submitted,

JENNIFER B. LOWERY
Acting United States Attorney

Southern District of Texas

s/ Baltazar Salazar

Baltazar Salazar

Assistant United States Attorney

Attorney-in-Charge for Plaintiff

S.D. Tex. ID. No. 3135288

Texas Bar No. 24106385

UNITED STATES ATTORNEY'S OFFICE

SOUTHERN DISTRICT OF TEXAS

600 E. Harrison, Suite 201

Brownsville, Texas 78520

Telephone: (956) 983-5067

Facsimile: (956) 548-2775

Email: Baltazar.Salazar@usdoj.gov

And By: The City of Pharr, Texas

/s/ Patricia A. Rigney

(signed with permission)

Patricia A. Rigney

City Attorney

Texas Bar No. 24048765

Southern District Id. No. 875533

Patricia.Rigney@pharr-tx.gov

118 S. Cage Blvd.

Pharr, TX 78577

956-402-4000

956-702-5313 fax

City Attorney for

Defendant City of Pharr, Texas

CERTIFICATE OF SERVICE

I certify that on August 30, 2021, a copy of the foregoing document was served on counsel for Defendants via CM/ECF notice of electronic filing.

s/ Baltazar Salazar

Baltazar Salazar

Assistant United States Attorney